

**HACH ROSE SCHIRIPA
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

TIMOTHY TANSKI, on behalf of himself and
others similarly situated,

Plaintiffs,

-against-

AVALONBAY COMMUNITIES, INC.,

Defendant.

Civil No. 15-cv-06260(LDW)(AKT)

**NOTICE OF MOTION FOR FINAL APPROVAL OF
THE CLASS AND COLLECTIVE ACTION SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of the Parties' Motion for Final Approval of the Class and Collective Action Settlement, along with the Declaration of Frank R. Schirripa in Support of Plaintiffs' Motion for Final Approval and the supporting exhibits attached thereto, Plaintiffs' respectfully request that the Court enter an Order:

- (1) granting final approval of the Joint Stipulation of Settlement and Release ("Settlement Agreement");¹
- (2) certifying as final and for settlement purposes the Settlement Class;
- (3) approving as fair and adequate the Rue 23 class settlement; and
- (4) approving the FLSA settlement.

¹ A true and correct copy of the Settlement Agreement has been submitted directly to the Court.

For the Court's convenience, annexed hereto as **Exhibit A** is an omnibus Proposed Order regarding (1) Plaintiffs' Motion for Final Approval, and (2) Plaintiffs' Motion for Attorneys' Fees and Costs and Approval of a Service Award.

Dated: New York, New York
July 24, 2019

Respectfully submitted,

HACH ROSE SCHIRIPA & CHEVERIE LLP

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